# 9

#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA.

Plaintiff,

Case:2:19-cr-20831 Judge: Drain, Gershwin A. MJ: Whalen, R. Steven Filed: 12-17-2019 At 03:22 PM INDI LAWRENCE RIDER V ROBERT WHITE

(LG)

v.

HON.

**VIOLATIONS:** 

D-1 LAWRENCE RIDER, D-2 ROBERT WHITE 18 U.S.C. § 1349 – Conspiracy to Commit Mail and Wire Fraud

18 U.S.C. § 1343 Wire Fraud

18 U.S.C. § 844(m) – Conspiracy to Use Fire to Commit a Felony

Defendants.

## **INDICTMENT**

The Grand Jury Charges:

# **GENERAL ALLEGATIONS**

At all times relevant to this Indictment:

1. "Arson-for-Profit" was a mail and wire fraud scheme to defraud in which an insured home was staged and intentionally set on fire by individuals who would profit by submitting fraudulent insurance claims for damage.

- 2. GR was the leader and organizer of a conspiracy to commit an arson-for-profit scheme to defraud an insurance company by arranging the arson of an insured residence with the intent to file a false damage claim.
- 3. GR recruited individuals to help him commit the arson-for-profit fraud scheme and communicated with those individuals using handwritten letters and the telephone.
- 4. GR identified the house to be burned and negotiated the amount of money each of the conspirators would receive from the fraudulently obtained insurance proceeds.
- 5. **LAWRENCE RIDER** (D-1) was related to GR and agreed to participate in the arson-for-profit scheme with him.
- 6. ROBERT WHITE (D-2) was an associate of GR and LAWRENCE RIDER who also agreed to participate in the arson-for-profit scheme.
- 7. "Sal" was an individual who purported to be the owner of the targeted insured home and who communicated with LAWRENCE RIDER and ROBERT WHITE from outside the State of Michigan using a cell phone and in person.
- 8. The insured home targeted by the defendants to be burned in the arson-for-profit scheme was located in Washington Township, Michigan.
- 9. The Washington Township home was insured by AAA Insurance, a company doing business in the Eastern District of Michigan and elsewhere.

#### **COUNT ONE**

(18 U.S.C. § 1349: Conspiracy to Commit Mail and Wire Fraud)

D-1 LAWRENCE RIDER D-2 ROBERT WHITE

From in or about May 2019, through in or about August 2019, in the 10. Eastern District of Michigan, Southern Division, defendants LAWRENCE RIDER (D-1), and ROBERT WHITE (D-2), willfully and unlawfully combined, conspired, and agreed, with GR, each other, and others, to commit the crimes of mail fraud and wire fraud, by knowingly executing and attempting to execute a scheme to defraud and to obtain money and property by means of false and fraudulent material pretenses, representations, and promises. In conspiring to commit the crimes of mail and wire fraud, the defendants transmitted and caused the transmission of wire communications in interstate commerce including: writings, signs, signals, and sounds in the form of phone calls, text messages, and the transfer of money, in violation of Title 18, United States Code, Section 1343, and knowingly conspired to cause mail to be delivered by commercial carrier including: insurance proceeds checks and letters, in violation of Title 18, United States Code, Section 1341.

#### Object of the Conspiracy

11. The object of the conspiracy and scheme was to defraud and to obtain money by means of false and fraudulent material pretenses, representations and promises from an insurance company in the Eastern District of Michigan, and to trick the insurance company into paying a false claim for fire damage to a house the company insured. It was further the object of the conspiracy for the defendants to use fire to burn the insured house, to make a false claim with the insurance company for damages, and to use the illegally obtained proceeds for their personal benefit, and enrichment.

# Manner and Means of the Conspiracy

- 12. **LAWRENCE RIDER**, and **ROBERT WHITE**, working together and with others including GR, devised a plan to make a false insurance claim for fire damage to a house located in Washington Township, Michigan.
- 13. It was part of the conspiracy that GR entered into an agreement with a homeowner to allow a home in Washington Township, Michigan to be used in the arson-for-profit scheme.
- 14. As part of this conspiracy, GR instructed LAWRENCE RIDER and ROBERT WHITE to work together and with others, to include Sal, to use fire to burn the Washington Township house and to file the false insurance claim for fire damage.

- 15. As part of the conspiracy, **LAWRENCE RIDER** and **ROBERT**WHITE communicated with Sal, both via text message and by voice through a cellular phone, concerning what steps to take to accomplish the conspiracy.
- 16. As part of the conspiracy, GR sent instructions to LAWRENCE RIDER and ROBERT WHITE over the phone and through hand written and mailed letters.
- 17. It was part of the conspiracy that LAWRENCE RIDER relayed messages from GR to ROBERT WHITE and others, which directed them about what steps to take to accomplish the conspiracy. During these conversations LAWRENCE RIDER gave assurances that he was "on top of everything" and they were "all together."
- 18. It was part of the conspiracy that GR worked with the homeowner to coordinate access to the house and to communicate with LAWRENCE RIDER and ROBERT WHITE.
  - 19. All in violation of Title 18, United States Code, Section 1349.

## COUNT TWO 18 U.S.C. § 1343 (Wire fraud)

Paragraphs 1-19 are included in this count.

20. On or about August 16, 2019, in the Eastern District of Michigan, defendants LAWRENCE RIDER, and ROBERT WHITE and others, including

GR, knowingly devised and executed, and aided and abetted each other in devising and executing a scheme to defraud and to obtain money from an insurance company by means of false and fraudulent material pretenses, representations and promises. With intent to defraud and for the purpose of executing the scheme, defendants **LAWRENCE RIDER**, and **ROBERT WHITE**, transmitted and caused the transmission of wire communications in interstate commerce. These communications included the wire transfer of funds in the amount of \$1,000 from Berkley Heights, New Jersey to Free Star Bank in Mount Clemens, Michigan.

21. All in violation of Title 18, United States Code, Section 1343.

#### **COUNT THREE**

18 U.S.C. § 844(m) (Conspiracy to Use Fire to Commit a Felony)

- D-1 LAWRENCE RIDER
  D-2 ROBERT WHITE
- Paragraphs 1 21 are included in this count.
- 22. From in or about May 2019, through in or about August 2019,

  LAWRENCE RIDER (D-1) and ROBERT WHITE (D-2) knowingly conspired and agreed to use fire to commit a felony, to wit: Conspiracy to Commit Mail and Wire Fraud, in violation of 18 U.S.C. §1349 and Wire Fraud, in violation of 18 U.S.C. §1343, in that they planned to set fire to an insured house located in

Washington Township, Michigan, for the purpose of collecting insurance proceeds, in violation of 18 U.S.C. §844(m).

# FORFEITURE ALLEGATIONS 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461

- 23. The above allegations contained in this Indictment are incorporated by reference as if set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461.
- 24. As a result of the violations of 18 U.S.C. §1349 and 18 U.S.C. § 844(m), as set forth in this Indictment, Defendants shall forfeit to the United States any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, pursuant to 18 U.S.C. § 981 with 28 U.S.C. § 2461.
- 25. <u>Money Judgment:</u> Such property includes, but is not limited to, forfeiture money judgments in an amount to be proved in this matter, representing the total amount of proceeds and/or gross proceeds obtained as a result of the Defendant's violations, as alleged in this Indictment.
- 26. <u>Substitute Assets:</u> If the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:
  - a. Cannot be located upon the exercise of due diligence;
  - b. Has been transferred or sold to, or deposited with, a third party;

- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek to forfeit any other property of the Defendant up to the value of the forfeitable property described above.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHER SCHNEIDER United States Attorney

s/John K. Neal
JOHN K. NEAL
Chief, White Collar Crime Unit
Assistant United States Attorney

KAREN L. REYNOLDS
Assistant United States Attorney

s/Shankar Ramamurthy
SHANKAR RAMAMURTHY
Assistant United States Attorney

Date: December 17, 2019

#### Case 2:19-cr-20831-GAD-RSW ECF No. 1 filed 12/17/19



|   |  | Case:2:19-cr-20831   |  |
|---|--|--|--|
| United States District Court<br>Eastern District of Michigan                | Criminal Case (  | Judge: Drain, Gershwin A.  MJ: Whalen, R. Steven Filed: 12-17-2019 At 03:22 PM   |  |
| NOTE: It is the responsibility of the Assistant U.S.                        | Attorney signing this form to                                  |  | IDER V ROBERT WHITE                            |
| Companion Case Information  |  | Companion Case Number:   |  |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :    |  | Judge Assigned:  |  |
| □ Yes ⊠ No  |  | AUSA's Initials:   | Me   |
| Case Title: USA v. Lawrence   | e Rider, et al   |  | ·  |
| County where offense occu   | rred: Wayne Count  | y and elsewhere  |  |
| Check One: ⊠Felony  | □Mis   | demeanor   | □Petty   |
| Indictment/Info<br>Indictment/Info  | ·  | prior complaint [Ca  | se number: ] blete Superseding section below]. |
| Superseding Case Informatio   | <u>'n                                      </u>                |  |  |
| Superseding to Case No:   |  | Judge:   |  |
| Corrects errors; no additi Involves, for plea purpose Embraces same subject | es, different charges or                                       | adds counts.   | or charges below:                              |
| Defendant name  |  | arges [  | Prior Complaint (if applicable)                |
| Please take notice that the below   | listed Assistant للباد   | ted States Attorn  | ney is the attorney of record for              |
| the above captioned case.   | ,  |  | <b>,</b>                                       |
| December 17, 2019  Date   | 211 W. Fo<br>Detroit, M<br>Phone: (3<br>Fax: (3′<br>E-Mail add | ynolds<br>United States Attorn<br>ort Street, Suite 20<br>1 48226-3277<br>13) 226-9672<br>13) 226-2873<br>dress: Karen.reynolds<br>Bar #: P31029 | 001  |

<sup>&</sup>lt;sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.